City Manager
Dr. Qiong X. Liu, P.E., PTOE

Mayor John J. Lee

Council Members
Anita G. Wood
Pamela A. Goynes-Brown
Isaac E. Barron
Richard J. Cherchio



## Utilities Department - Randall E. DeVaul, P.E.

December 29, 2015

Ms. Michelle Josilo Water Section I (ENF3-1) US Environmental Protection Agency Region 9 75 Hawthorne Street San Francisco, CA 94105

Re: Order CWA-309-15-011 City of North Las Vegas NPDES Permit No. NV0023647 January 1, 2016 Milestones

Dear Ms. Josilo:

In response to Administrative Order CWA-309(a)-15-011, the City of North Las Vegas is submitting the following documents to comply with the January 1, 2016 key milestone date:

- Draft Enforcement Response Plan
- Draft IPP Funding and Staffing Plan
- Draft Updated Multi Jurisdictional Agreement

As mentioned in the December 11, 2015 letter from Ken Greenberg, Manager, Water Section I, Enforcement Division, the key milestone date for the Headworks Analysis Report has been extended to January 14, 2016.

Also as mentioned in the December 11<sup>th</sup> letter, "equivalent residential units" were chosen to estimate flows from Paint & Body Collision and Boston Cleaners to address questions from EPA's October 16<sup>th</sup> letter because the Las Vegas Valley Water District provides water service to these businesses. Fixture counts for both businesses were taken and converted to equivalent residential units per our City Code. One ERU equates to 90,000 gpd, which is the average use for a single family structure in North Las Vegas. As requested, we will request consumption data from the Las Vegas Valley Water District to obtain more accurate flows. It should be noted that both Clark County and City of Las Vegas uses similar fixture counts to calculate their sewer bills.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Ms. Michelle Josilo, USEPA January 1, 2016 Milestones December 29, 2015 Page 2 of 2

If you have any questions regarding this submittal, please contact me at (702) 633-1903.

Sincerely.

Randall E. DeVaul, P.E., Director

**Utilities Department** 

Cc: Qiong Liu, P.E., PTOE, City Manager

Sandra Morgan, City Attorney

James Polek, USEPA